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August 16, 2022

Via Electronic Mail and Filed by ECF

The Honorable Pamela K. Chen  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Traffic Sports USA et al., Docket No. 14-cr-609 (PKC)  
Consent Request for Limited Stay of Restitution Payment

Dear Judge Chen:

We write on behalf of Traffic Sports USA, Inc. (“TUSA”) and Traffic Sports International, Inc. (“TSI”) (jointly “Traffic”), corporate defendants who were cooperators and pled guilty in connection with the investigation of corruption in international soccer conducted by the Department of Justice (“DOJ”). Traffic’s restitution obligations are currently stayed until August 20, 2022. We write to request another stay, until December 20, 2022, to allow the government to file a letter request asking that the Court find that Traffic’s restitution obligations have been satisfied based on funds forfeited in this case, and to permit the Court to consider that request.

This request relates to the Court’s order finding Traffic responsible, jointly and severally with other defendants, for restitution owed to CONMEBOL in the amount of \$333,587.25. On March 3, 2022, this Court issued an Order finding that the restitution obligations of certain defendants in 15-CR-252 had been satisfied in light of the remission petition and distribution authorized by the DOJ. ECF No. 1732. The DOJ’s February 22, 2022 letter to the Court explained that the Money Laundering and Asset Recovery Section approved a petition for remission granting remission of up to a total of more than \$201 million, and that an initial distribution of more than \$32 million in forfeited funds had been made. ECF No. 1725. On May 20, 2022, the Court granted a request by Traffic to allow the DOJ to continue to consider the pending application for remission or restoration. Order (May 20, 2022). The Court has also granted prior stays of Traffic’s restitution obligations. *See, e.g.*, Orders (May 13, 2020, December 10, 2020, May 13, 2021, and January 20, 2022).

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With the government's consent, we write to request a stay of Traffic's restitution obligations until December 20, 2022, to allow the government additional time to file a letter requesting that the Court also find that the restitution obligations of TUSA and TSI are satisfied by the DOJ's remission petition and distribution of certain funds to certain victims. We understand that the government intends to make this request of the Court.

Please let us know if any additional information would be helpful.

Respectfully submitted,

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